

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

William Belebemah

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Apex Mortgage
Alhasane Aguibou Soumah

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. 22-CV-1733-RDB
(to be filled in by the Clerk's Office)

Jury Trial: ☐ Yes ☐ No
(check one)

FILED

LOGGED

ENTERED

RECEIVED

JUL 14 2022

AT GREENBELT
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND

BY

DEPUTY

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>William Belebemah</u>
Street Address	<u>5850 Cameron run Ter</u>
City and County	<u>Alexandria Apmt 310</u>
State and Zip Code	<u>22303</u>
Telephone Number	<u>202-848-8925</u>
E-mail Address	<u>bellwillbride@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Apex Mortgage LLC</u>
Job or Title (if known)	<u></u>
Street Address	<u>8850 Columbia 100 Phwy Ste 215</u>
City and County	<u>Columbia</u>
State and Zip Code	<u>Maryland 21045</u>
Telephone Number	<u>410-715-4567</u>
E-mail Address (if known)	<u></u>

Defendant No. 2

Name Alhasane Aguibou Soumah
Job or Title Vice President
(if known)
Street Address 8850 Columbia 100 Pkwy Ste 215
City and County Columbia
State and Zip Code Maryland 21045
Telephone Number 443-844-5817
E-mail Address AlSoumah@gmail.com
(if known)

Defendant No. 3

Name _____
Job or Title _____
(if known)
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail Address _____
(if known)

Defendant No. 4

Name _____
Job or Title _____
(if known)
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail Address _____
(if known)

(If there are more than four defendants, attach an additional page providing the same information for each additional defendant.)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) William Belebemah, is a citizen of the State of (name) Virginia.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Alhasane Aguibou Soumah is a citizen of the State of (name) Maryland. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) APEX Mortgage LLC, is incorporated under the laws of the State of (name) Maryland, and has its principal place of business in the State of (name) Maryland. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

~~A real estate transaction that never~~ \$735,000 Amount of the Real property that would have been purchased but never materialized due to negligence.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The plaintiff is entitled to damages and/or relief is being sought due to the facts that are as follows: April 6 is the day the process had started with the defendants. Apex Mortgage LLC and Alhasane Soumah began working on my loan after requesting money upfront, in the amount of \$17,500, \$14,000 and \$10,000, ~~per~~ to finding a home. Once under contract Alhasane became unreachable by phone and office visits. Documents requested by Alhasane were given promptly and in a timely manner. The loan never materialized and no proof could be found that the proceedings of a loan even began.

Apex Mortgage LLC and Alhasane Aguibou Soumah ~~are~~ willfully and maliciously harmed the plaintiff through the acts of negligence, fraud, and misrepresentation. Alhasane Aguibou Soumah is not a ~~per~~ licensed lender in Maryland. Alhasane and Apex Mortgage LLC failed ~~very~~ to successfully close the loan by dates set by the Real Estate Agents based off of the timetable given by Alhasane Aguibou Soumah. When asked by the plaintiff for the work that was done on the loan Alhasane couldn't release what he didn't have. A denial letter also was never received per NMLS guidelines.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. For any request for injunctive relief, explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

\$735,000 is the request the plaintiff ask of the court.
Price of the home is the basis along with the time lost
that I can never receive back. I am entitled to \$735,000
because ~~that was~~ had everything been done ethically, that
is the amount I would have received in the form of property

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: _____, 20__.

Signature of Plaintiff

Printed Name of Plaintiff

(If more than one plaintiff is named in the complaint, attach an additional certification and signature page for each additional plaintiff.)

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

Email Address

